

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

Christopher Davis-Clair,
Plaintiff

V.

Case No. _____

C.O.Turck,C.Francois(Corrections Program
Supervisor)K.O'Dell(Offender Class Specialist),
John Doe-1(Social Worker),John Doe-2(PSU Supervisor
of GBCI),
Defendant's.

COMPLAINT.

Comes Now, the plaintiff, Christopher Davis-Clair, "Davis-Clair", proceeding herein, pro-se, pursuant to title 42 U.S.C. & 1983, with his complaint against the above named defendant's.

PARTIES.

1. Christopher Davis-Clair, Plaintiff, is a United States Citizen and adult resident of the state of Wisconsin and at all times relevant to this action, was confined at Green Bay Corr. Inst. as a prisoner located at: P.O.Box ~~2222~~ 19033, Green Bay, Wis. 54307, now housed at: (WSPF) P.O.Box 9900, Boscobel, Wis. 53805.

2. Turck, Francois, O'Dell, John Doe-1, John Doe-2, Defendant's., is a United States Citizen and adult resident of the state of Wisconsin and at all times relevant to this action was employed by the state of Wisconsin, Dept. of Corr., whose employed by the state whose address is: (GBCI) P.O.Box 19033, Green Bay, Wis. 54307.

STATEMENT OF CLAIM.

3. Davis-Clair seen the social worker (John Doe-1) at Green Bay Corr. in segregation and Davis-Clair explained to the social worker that he didn't think that it would be a good ideal to send him to (WSPF) because he would be far away from home where his family would not be able to see him which would cause his suicidal attempts.

4. Later that day Davis-Clair went back to the cell and wrote to PSU saying that he would like to see someone because the institution was trying to send him to (WSPF), in which he thought it would make him suicidal being in a closed setting and away from his family. He never received a response.

5. Davis-Clair seen PRC which was a committee that included O'Dell the Offender Class Specialist and Francois the Corrections Program Supervisor and at the hearing the plaintiff explained that he didn't think that it was a good ideal to send him to (WSPF) because the closed in area and being far from home at a young age would only led to suicide attempts ~~and~~ and if I get approved to go to (WSPF) I ask that you have someone check on me because I know I will attempt suicide because going all the way out there away from my family would not help. They stated Mr. Davis-Clair you are just going to have to deal with it, you made this chose. The defendant's said that

they would tell the RR PSU Supervisor of Green Green security staff. See, Ex. 1

6. On 2-8-16, Davis-Clair was housed in cell E-34 of Hall.

7. On 2-8-16, C.O. Turck told Davis-Clair to pack his that the property officer could pack it up because transferred to WSPF the next day. Davis-Clair said to you to get the Psychologist over here because if not going to have to send me to observation, he just pack will get to that later and walked off.

8. A couple of minutes later Davis-Clair went and got razor and started walking back and forth in the room to cut his wrist and Turck came back and seen what and for a minute he just stood there watching then he told Davis-Clair I'm giving you a direct order to stop and at first Davis would not, and Turck walked off Hilbert and he gave Davis a direct order to stop Hilbert stated that if he didn't stop cutting he would O.C. Spray Davis followed these commands.

9. Once Davis-Clair stopped the C.O.'s got him cuffed him over to the HSU to get cleaned up and then he went to the observation in the restrictive housing unit.

10. At HSU Davis-Clair cut's were pictures taken of told that they would be placed in his HSU file.

11. While in HSU Lt. Lenz came and spoke with Davis-Clair him what was going on and Davis explained to him what and that he had told the officer while he was packing up and he said that they take care of that later to file a complaint on him. Lenz told him man look tomorrow just sit back and you'll be out I'll look into the situation and let you know the you are at WSPF.

12. While sitting in observation when the another white his round that night Davis-Clair asked him about a ICE shirt did you can't get them in observation, then asked him what it's and he said and he said the Staff refused to get going on ologist and he told him what Lenz had told him and the psych- said Lenz is good at looking into things and if she the white shirt then she'll investigate and let you know what the said she would you are at WSPF, so I wouldn't worry about it. out come is while

13. The next day Davis-Clair was transferred to Dodge Correctional and placed back into observation for a temporary hold.

14. Upon information and belief if C.O. Turck would have got a PSU worker that Davis-Clair could have spoken to he would never cut his wrist because he could been placed on observation and/or they could have talked him out of it because they are trained that.

15. Upon Information and belief once a inmate tells the staff and or the psychologist that they are suicidal or need to be placed in observation because they ~~was~~ want to kill there self even if they change there mind per Adminstrative Code 500.70.25.

16. Program Review Committee Francois and O'Dell were both placed on notice that Davis-Clair stated going to WSPF and taken him away from his family and being in a closed ~~environment~~ environment would make him suicidal.

17. PSU Supervisor at GBCI was placed on ~~was~~ notice of that Davis-Clair stated going to WSPF and taken him away from his family and being in a ~~also~~ closed environment would make him suicidal.

18. The Soial Worker at GBCI was placed on notice of that Davis-Clair stated going to WSPF and taken him away from his family and being in a closed environment would make him suicidal.

19. Turck was placed on notice that Davis-Clair was feeling suicidal and did nothing until it was to late.

20. Davis-Clair should have been placed in observation.

21. Once Davis-Clair was notified to go to WSPF the psychologist should have came to speak with Davis-Clair and/or placed him on observation due to what he told all these staff at GBCI.

22. Davis-Clair could not file a ICE and a something that was being Investigated by the Security which is what would have happened if he would have filed a complaint so that left Davis-Clair to beleave that he couldn't knowing that Lenz stated don't worry about filing a complaint I'll take care ~~add~~ of it.

FIRST CONSTITUTIONAL CLAIM.

Incorporating paragraphs 3 thur 22 plaintiff alleges that the defendant's ~~was~~ violated his 8th Amendment Deliberate Indifference. Woodward V. Corr.Med.Serv. of Ill, Inc., F.3d 917-28(7th cir.2004).

REQUESTED RELIEF.

1. Issue a award Compensatory Damages, to the plaintiff in the amount of Ten Thousand(\$10,000)Dollars.

2. Issue a award Punitive damages, to the plaintiff against the Defendant's in the amount of Ten Thousand(\$10,000)Dollars jointly and severally.

3. Nominal damages.

4. Presumed Damages.

5. Plaintiff Demands a trial by jury on all matters ~~and~~ triable.

6. All claims are brought against the defendant's in his persona;l ~~separate~~ capacities.

CONCLUSION.

Wherefore, plaintiff respectfully pray this Honorable court to Grant the requested relief sought herein.

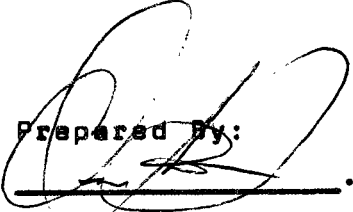
I, declare under penalty that all statements ~~are~~ made herein are true and correct to the best of my personal knowledge.

Respectfully Submitted,

Dated this ____ day of
_____, 2017.

Christopher Davis-Clair #609207
(WSPF) P.O. Box 9900
Boscobel, Wis. 53805

Prepared By:



Oscar Garner #441303
(Prisoner to Prisoner
Legal Aid).